

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

YU LING SHEN, individually and on behalf of
all other employees similarly situated,

Plaintiff,

-against-

DECLARATION

15 CV 663(GHW)

466 AMAZE CORP. d/b/a Amaze Fusion
& Lounge, XUE MEI CHEN and JOHN (FIRST
NAME UNKNOWN) HUANG,

Defendants.

BERNARD D’ORAZIO hereby declares the following to be true under the penalties of perjury:

1. I am principal attorney with Bernard D’Orazio & Associates, P.C., attorneys appearing herein for the plaintiff-judgment creditor. I submit this declaration at the direction of the Court in the May 6, 2016, Order holding defendants-judgment debtors 466 Amaze Corp. d/b/a Amaze Fusion & Lounge and Xue Mei Chen in contempt of court.

2. The Court in its Order (Exhibit A) awarded plaintiff costs and attorneys’ fees incurred “in connection with seeking discovery in the aid of execution of the Court’s June 30, 2015, default judgment”

3. Attached as Exhibit B are records for the time recorded by me at my regular hourly rate of \$500 in connection with seeking post-judgment discovery through today’s date, amounting to \$12,095.80. This amount was not billed to our client as this is a contingency fee judgment enforcement engagement.

4. Attached as Exhibit C are invoices for \$513.20 in expenses incurred in connection with seeking post-judgment discovery.

5. I was admitted to practice law in New York in 1986. I hold a J.D. from St. John's University School of Law, where I graduated in the top 5% of my class and was a published member of the Law Review. I was began my career working as a law clerk for the New York State Court of Appeals in Albany. I then worked at Cadwalader, Wickersham & Taft and two other Manhattan law firms. I have over 29 years' experience in commercial litigation, with a focus on commercial debt collection litigation, judgment enforcement, and creditors' rights matters.

6. I respectfully request that the Court direct the defendants-judgment debtors to (A) pay the damages awarded within 30 days of the Court's Order and (B) appear for their depositions and produce the demanded discovery by the same date to purge their contempt of this Court.

WHEREFORE, plaintiff requests that defendants-judgment debtors 466 Amaze Corp. d/b/a Amaze Fusion & Lounge and Xue Mei Chen be ordered to pay damages of \$12,095.80 in attorneys' fees and \$513.30 in costs, for a total of \$12,609.10.

Dated: New York, New York
March 17, 2016

s/Bernard D'Orazio

BERNARD D'ORAZIO